

- (b) Substitute Channel 225C1 for Channel 260C1 at La Grande, Oregon, and modify the license for Station KWRL to specify operation on Channel 225C1 at La Grande; and
- (c) Substitute Channel 295C2 for vacant and un-applied for Channel 261C2 at Arlington, Oregon.

Attached hereto is an Engineering Statement prepared by the firm of Hatfield & Dawson which establishes that Channel 258A can be allotted to Ione, Oregon, using the same reference point as the one used in the proposal to allot Channel 295A to that community, in full compliance with the Commission's FM channel allotment rules and that the proposed reclassification of Station KHSS' channel, the re-allotment of the reclassified channel to Athena, Oregon, and the changes in the allotments at Hermiston, La Grande and Arlington, Oregon that are necessary to accommodate the proposed changes in Station KHSS' classification and city of license also fully comply with the Commission's allotment rules.

The Engineering Statement also contains a detailed showing as to the gain and loss areas that will result from the change of classification of KHSS' channel to C2 and the reallocation of the channel to Athena, the substitution of Channel 295C2 for Channel 261C2 at Arlington, which involves a change in the allotment site. Although the changes proposed for KHSS' channel class and allotment will result 2,288 persons in an area of 426 sq. kilometers losing service from KHSS, the proposed changes will

result in 29,779 people in an area of 4,183 sq. kilometers gaining service for a net gain of 27,491 people and 3,737 sq. kilometers. Moreover, none of the area that will lose service from KHSS receives fewer than 5 aural services. In the case of the allotment change at Arlington which is necessary in order to accommodate the proposed changes in KHSS' channel classification and city of license, there will be a net loss of service to 2,398 people, but no change in net area served. No white areas will result from the proposed change in the reference point for the Arlington allotment, but 136 people in an area of 14 sq. kilometers will be left with only one aural service, 14 people and an area of 4 sq. kilometers will be left with only two services, an unpopulated area of 11 sq. kilometers will be left with only three services, and 2 people and an area of 43 sq. Kilometers will be left with only 4 services. It is to be noted, however, that there will be no actual loss of service because the Arlington allotment that is to be changed is vacant.

Athena, Oregon, is an incorporated community with a city council and mayor form of government and a population based on 2000 U.S. Census data of 1,221. Public education grades K through 12 in Athena is administered by the Athena-Weston School District of Umatilla County. Athena has a local library, a planning commission, and a chamber of commerce. Athena has more than 25 local business establishments which engage in a wide

range of activities including retail sales, manufacturing, construction, finance and insurance, health care and social services, and public accommodations. Churches in Athena include the Seventh Day Adventists, Catholic, and Baptist. Accordingly, Athena clearly is a distinct community which qualifies for its own local broadcast service.

As grant of this counterproposal will bring a first local aural service to the community of Athena, Oregon, will result in a net gain of 27,491 people receiving service from KHSS, and will result in a minimal number of people (152) who currently receive fewer than 5 aural services losing what is only theoretical service from a future station utilizing the Arlington allotment, grant of the allotment changes proposed in this Counterproposal will serve the public interest.

If this Counterproposal is granted, Two Hearts will promptly file an application for a construction permit to change Station KHSS' channel to 264C2 at Athena, will promptly construct facilities following grant of its application and will reimburse the licensees of Stations KWRL and KQFM for the reasonable costs of changing their channels of operation to accommodate the proposed changes in KHSS' city of license and classification.

WHEREFORE, for the foregoing reasons, it is respectfully submitted that adoption of the changes in the Table of FM allotments proposed herein would serve the public interest.

Respectfully submitted,


David Tillotson

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Date: March 17, 2005

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ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO AMEND SECTION 73.202 OF THE RULES AND REGULATIONS FOR THE FEDERAL COMMUNICATIONS COMMISSION

**TO ASSIGN:
FM CHANNEL 264C2 FOR USE AT ATHENA, OR
FM CHANNEL 261A FOR USE AT HERMISTON, OR
FM CHANNEL 295C2 FOR USE AT ARLINGTON, OR
FM CHANNEL 225C1 FOR USE AT LA GRANDE, OR**

TWO HEARTS COMMUNICATIONS, LLC

MARCH 2005

**Engineering Statement
Counterproposal in MB Docket No. 05-9
March 2005**

This Engineering Statement has been prepared on behalf of Two Hearts Communications, LLC ("Two Hearts"), licensee of station KHSS Channel 264C3 Walla Walla, in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Substitute Channel 264C2 for Channel 264C3 at Walla Walla, Washington, reallocate Channel 264C2 to Athena, Oregon, and modify the license of station KHSS to specify operation on Channel 264C2 at Athena;
- 2) Substitute Channel 261A for Channel 263A at Hermiston, Oregon, and modify the license of station KQFM to specify operation on Channel 261A at Hermiston;
- 3) Substitute Channel 225C1 for Channel 260C1 at La Grande, Oregon, and modify the license of station KWRL to specify operation on Channel 225C1 at La Grande, and;
- 4) Substitute Channel 295C2 for vacant-and-unapplied-for Channel 261C2 at Arlington, Oregon.

This reallocation plan is being filed as a counterproposal in MB Docket No. 05-9. The lead proposal in this proceeding proposes the allotment of Channel 295A at Lone, Oregon.¹

¹ With regard to the lone proposal, Hatfield & Dawson Consulting Engineers wishes to formally acknowledge that it prepared the engineering for the original lone filing by Klickitat Broadcasting. However, the Klickitat Broadcasting filing proposed the allotment of Channel 226A at lone. It could not be anticipated that the Commission would instead propose the allotment of Channel 295A at lone when the Notice of Proposed Rulemaking was released. There is no connection between Klickitat Broadcasting and Two Hearts Communications, LLC. Furthermore, the availability of an alternate channel for use at lone (as detailed herein) will allow both the original proposal and the instant counterproposal to be granted by the Commission.

Hatfield & Dawson Consulting Engineers

The proposed reallocation plan is in the public interest, as it will provide the following benefits:

- 1) Athena, Oregon, an incorporated city with a 2000 Census population of 1,221 persons, will receive its first local service.
- 2) There will be an overall net gain in service to 25,093 persons and 3,757 sq km of area.

Schematically, the proposal is as follows:

Community	Present	Proposed
Arlington, OR	261C2	295C2
Athena, OR	- - -	264C2
Hermiston, OR	263A	261A
La Grande, OR	254C2, 260C1	225C1, 254C2
Walla Walla, WA	227C1, 239C, 246C0 ² , 256C2 ³ , 264C3	227C1, 239C, 246C0

Channel 264C2 at Athena, Oregon

As outlined in the attached channel study, Channel 264C2 can be assigned for use at Athena in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 261A is substituted for Channel 263A at Hermiston.

² Channel 246C at Walla Walla was downgraded to Channel 246C0 by the grant of modification of license application BMLH-20030908ACK for station KXRX on October 2, 2003.

³ Channel 256C2 at Walla Walla was reallocated as Channel 256C1 at Burbank, Washington, by the Report and Order in MB Docket No 02-63, released on February 4, 2005. That action will be effective on March 21, 2005.

The spacing study reflects a prior proposal by Two Hearts to substitute Channel 264C2 for Channel 264C3 at Walla Walla, and reallocate Channel 264C2 to College Place, filed as a counterproposal in MB Docket No. 02-136. That proposal also requested that Channel 261A be substituted for Channel 263A at Hermiston. The Two Hearts counterproposal in MB Docket No. 02-136 was dismissed by the Commission in the Report and Order released on July 9, 2004, which action is now effective.

For this spacing study preferred site coordinates for an existing tower site (N45-47-41 x W118-10-06) have been used. This site is 26 kilometers from the far side of Athena. The nominal distance to the 70 dBu F(50,50) contour for a Class C2 station is 32.6 kilometers. Therefore, and as depicted on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Athena.

The proposed allotment of Channel 264C2 will provide the first local service at Athena. Walla Walla will retain local service from FM stations KWWB Channel 209C2, KWCW Channel 213A, KRKL Channel 227C1, KNLT Channel 239C, and KXRX Channel 246C0; and from AM stations KGDC 1320 kHz, KUJ 1420 kHz, and KTEL 1490 kHz.

Channel 261A at Hermiston, Oregon

In order to accommodate the allotment of Channel 264C2 at Athena, it is necessary to substitute Channel 261A for Channel 263A at Hermiston for use by KQFM. As outlined in the attached

channel study, Channel 261A can be assigned for use at Hermiston in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments at the licensed transmitter site coordinates of KQFM (N45-51-57 x W119-18-38), assuming that the requested substitutions are made at La Grande and Arlington.

The spacing study reflects a prior proposal by Two Hearts to substitute Channel 261A for Channel 263A at Hermiston for use by KQFM, filed as a counterproposal in MB Docket No. 02-136. That proposal also requested that Channel 263C2 be assigned for use at Arlington in lieu of Channel 261C2. The Two Hearts counterproposal in MB Docket No. 02-136 was dismissed by the Commission in the Report and Order released on July 9, 2004, which action is now effective.

Channel 225C1 at La Grande, Oregon

In order to accommodate the allotment of Channel 261A at Hermiston, it is necessary to substitute Channel 225C1 for Channel 260C1 at La Grande for use by KWRL. As outlined in the attached channel study, Channel 225C1 can be assigned for use at La Grande in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments at the licensed transmitter site coordinates of KWRL (N45-12-59 x W118-00-00).

Channel 295C2 at Arlington, Oregon

In order to accommodate the allotment of Channel 261A at Hermiston, it is necessary to substitute Channel 295C2 for vacant-and-unapplied-for Channel 261C2 at Arlington.⁴ As outlined in the attached channel study, Channel 295C2 can be assigned for use at Arlington in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments at modified allotment site coordinates (N45-33-52 x W120-19-00). The only exception is a 131 kilometer short-spacing to the lead proposal in this proceeding to allot Channel 295A for use at Lone, Oregon.

As detailed by the attached spacing study, Channel 258A is also available for use at Lone at the allotment coordinates specified in the NPRM, assuming that Channel 295C2 is substituted for Channel 261C2 at Arlington.

The proposed allotment site is 21 kilometers from the far side of Arlington. The nominal distance to the 70 dBu F(50,50) contour for a Class C2 station is 32.6 kilometers. Therefore, and as depicted on the attached map exhibit, this site will provide greater than 70 dBu coverage for all of Arlington.

The Instant Counterproposal is Preferred

Grant of the instant counterproposal would provide the first local service at Athena, Oregon, the population of which is 1,221 persons. By comparison, grant of the NPRM proposal for Channel

⁴ The Arlington allotment was created by the Commission's Report and Order in MB Docket No. 02-136, released on July 9, 2004, which action is now effective.

295A at lone, Oregon, would provide a first local service to a considerably smaller community of only 734 persons. In any case, an alternate channel is available for allotment at lone, since grant of the instant counterproposal would make available Channel 258A at lone as demonstrated by the attached spacing study at the lone Channel 295A allotment coordinates specified in the NPRM.

Gain and Loss Areas

The allotment channel changes at Hermiston and La Grande do not involve any change in transmitter/allotment site or class, and therefore do not create any gain or loss areas.

The population figures quoted in the following gain and loss area studies are derived from 2000 Census data using the block centroid method.

Athena Gain and Loss Areas

The gain area directly associated with the reallocation of Channel 264C3 Walla Walla to Channel 264C2 Athena encompasses 4,183 sq km and a population of 29,779 persons. The associated loss area encompasses 426 sq km and a population of 2,288 persons. These figures equate to a net gain of service to 3,737 sq km and 27,491 persons.

Arlington Gain and Loss Areas

The gain area directly associated with substitution of Channel 295C2 for Channel 261C2 at Arlington (including an allotment site change) encompasses 1,987 sq km and a population of 2,029 persons. The associated loss area encompasses 1,987 sq km and a population of 4,427 persons. These figures equate to a net loss of service to 2,398 persons, with no net change in area.

It should be noted that there will be no actual loss of service provided by the Arlington channel substitution, since the Arlington allotment is vacant.

Overall, the reallocation plan will result in a net gain of service to 3,757 sq km and 25,093 persons.

Gain and Loss Area Services Analysis

Analysis has been made of the number of services remaining in the loss areas and existing in the gain areas associated with the allotment modifications at Athena and Arlington⁵:

Athena Loss Area

The entire loss area associated with the reallocation of Channel 264C3 Walla Walla to Channel 264C2 Athena will remain well-served, with at least five remaining services. Each of the following six stations provides 60 dBu service to 100% of the loss area:

KZHR	223C1	Dayton, WA
KRKL	227C1	Walla Walla, WA
KNLT	239C	Walla Walla, WA
KXRX	246C0	Walla Walla, WA
KHTO	250C1	Milton-Freewater, OR
KWHT	278C1	Pendleton, OR

⁵In determining reception service provided by FM stations, the area of service circumscribed by the station's 1.0 mV/m signal contour was considered, assuming 1) actual facilities for non-commercial stations operating on reserved channels, 2) maximum facilities for the class of station for stations (other than Class C stations) operating on non-reserved channels, and 3) minimum or existing Class C facilities, whichever is greater, for Class C stations. For clear channel Class A AM stations, the service area was defined by the station's 0.5 mV/m groundwave contour, based on its licensed facilities. For all other classes of full-time AM stations, reception service was defined as that service received within a station's nighttime interference-free contour. See Meeker and Craig, Colorado, 15 FCC Rcd 23858 (2000), Stamps and Fouke, Arkansas, 14 FCC Rcd 10533 (1999), Silverton and Bayfield, Colorado, 14 FCC Rcd 4071 (1999), Malvern and Bryant, Arkansas, 13 FCC Rcd 8426 (1998), and others.

Numerous other stations provide service to portions of the Athena loss area. A list of those stations can be provided should the Commission so require.

Athena Gain Area

100% of the Athena gain area is well-served, with at least five existing services.

Arlington Loss Area

No white area will be created by the modification of the Arlington allotment from Channel 261C2 to Channel 295C2, and those gray and underserved areas which will be created are very small in area and population. Each of the following stations provides service to a portion of the loss area:

A	KCLK	1400 kHz	Goldendale	(NIF = 25.3 mV/m)
B	KFAE-FM	206C	Richland	
C	KSOH	208C2	Wapato	
D	KOLU	211C2	Pasco	
E	KRBM	215C2	Pendleton	
F	KYPL	216C1	Yakima	
G	KDNA	220C1	Yakima	
H	KDBL	225C2	Toppenish	
I	KATS	233C1	Yakima	
J	KIOK	235C	Richland	
K	New FM	241C2	Stanfield	
L	KOLW	248C1	Basin City	
M	KEYW	252C2	Pasco	
N	KLES	254C2	Mabton	
O	KHHK	259C3	Yakima	
P	KQFM	263A	Hermiston	
Q	KARY-FM	265C2	Grandview	
R	KGDN	267C3	Pasco	
S	KMNA	269C3	Prosser	
T	KYYT	272C2	Goldendale	

U	KORD-FM	274C	Richland
V	KXDD	281C1	Yakima
W	KONA	287C	Kennewick
X	KRSE	289C1	Yakima
Y	KEGX	293C	Richland
Z	KFFM	297C	Yakima
AA	Vacant	283C1	Moro ⁶

The service areas of these stations are plotted on the attached map exhibit, with the contours labeled with the corresponding letter used above.

One small area will be left with only 1 aural service remaining. As depicted on the attached loss area detail study maps, 19 persons in a 6 sq km area will be left with 1 aural service remaining. It should be noted that there will be no actual loss of service since the Arlington allotment is vacant. Furthermore, an allotment at lone will provide additional service to this area. While the Commission's Decision in *Sells, AZ* (MB Docket No. 02-376, Report and Order released on November 22, 2004) states that vacant allotments are insufficient to offset the loss of service which would result from the relocation of an existing station, that policy is not believed to pertain to the instant case because the Arlington allotment is itself vacant.

⁶ The Moro Channel 283C1 allotment was made by the Report and Order in MB Docket No. 02-136. There is a pending Application for Review of the Commission decision in that proceeding. However, even if the original Commission decision in Docket 02-136 is overturned on review, and the Moro allotment is not ultimately made, such action would not adversely affect the results of this study since KMCQ Channel 283C would remain at The Dalles and would also provide service to a similar portion of the Arlington loss area.

Certain other small areas will be left underserved (fewer than 5 services remaining). Excluding the gray area discussed above, 118 persons in a 9 sq km area will be left with 2 aural services, 4 persons in a 10 sq km area will be left with 3 aural services, and zero persons in a 7 sq km area will be left with 4 aural services. It should be noted that there will be no actual loss of service since the Arlington allotment is vacant.

Arlington Gain Area

No existing white area will be filled by the modification of the Arlington allotment from Channel 261C2 to Channel 295C2, but there will be new service to existing gray area and extensive underserved areas. Each of the following stations provides service to a portion of the gain area:

A	KCLK	1400 kHz	Goldendale	(NIF = 25.3 mV/m)
B	KMSW	224C3	The Dalles	
C	Vacant	228A	Condon	
D	New FM	241C2	Stanfield	
E	KWLZ-FM	243C	Warm Springs	
F	KACI-FM	249C2	The Dalles	
G	Vacant	251C1	Madras	
H	Vacant	268C3	The Dalles	
I	KYYT	272C2	Goldendale	
J	Vacant	283C1	Moro	

The service areas of these stations are plotted on the attached map exhibit, with the contours labeled with the corresponding letter used above.

New service will be provided to an existing gray area (1 existing service) of 68 sq km and 27 persons.

In addition to the service to existing gray areas, new service will be provided to existing underserved areas: 4 persons in a 64 sq km area who presently receive 2 services; 979 persons in an 809 sq km area who presently receive 3 services; and 32 persons in a 346 sq km area who presently receive 4 services.

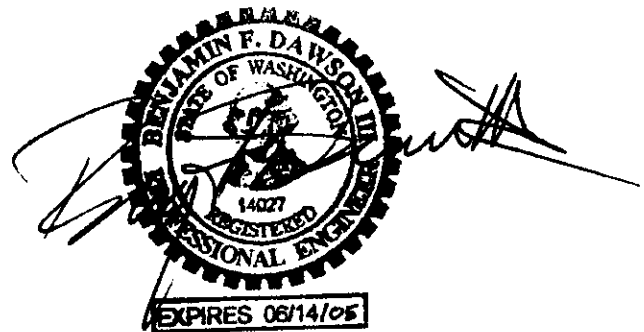
Tuck Analysis

Athena is not located within any Urbanized Area per the 2000 Census. Neither does the proposed Athena 70 dBu contour encompass any portion of any Urbanized Area. Based upon these circumstances, no "Tuck" analysis is believed to be required in support of the proposed reallocation plan.

Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at various communities in Oregon and Washington has been prepared by Erik C. Swanson under my direct supervision. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 14th day of March, 2005.



Benjamin F. Dawson III, P.E.

A handwritten signature in black ink, appearing to read "Erik C. Swanson".

Erik C. Swanson

Hatfield & Dawson Consulting Engineers

FMSTUDY.EXE Copyright 2004, Hatfield & Dawson, LLC Version 1.70

SEARCH PARAMETERS

FM Database Date: 050308

Channel: 264C2 100.7 MHz
 Latitude: 45 47 41
 Longitude: 118 10 6
 Safety Zone: 32 km
 Job Title: KHSS ATHENA 264C2

Page 1

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K261BS LIC	MILTON-FREEWATER OR	BLFT-851224TC	261D 100.1	0.044 170.0	DA 45-55-24 118-22-18	312.3	21.30 0.00	0 TRANS
K261CG LIC	PASCO WA	BLFT-930913TC	261D 100.1	0.011 518.0	DA 46-06-23 119-07-50	295.3	82.26 0.00	0 TRANS
K262AV CP	WALLA WALLA WA	BNPFT-030826AGJ	262D 100.3	0.038 132.0	DA 46-04-50 118-17-04	344.3	33.02 0.00	0 TRANS
NEW RSV	TROY ID	-	263C2 100.5	0.000 0.0	46-40-40 116-58-31	42.6	134.55 4.55	130 CLOSE
NEW APP	TROY ID	BNPH-041227ACH	263C2 100.5	26.500 209.0	46-42-18 116-55-25	42.9 SS	139.47 9.47	130 CLOSE
ADD NOTE:	ARLINGTON OR	RM-bg-19	263C2 100.5	0.000 0.0	45-43-04 120-11-53	267.6	158.15 28.15	130 CLEAR
DEL NOTE:	HERMISTON OR	RM-bg-19	263A 100.5	0.000 0.0	45-51-57 119-18-38	275.5	89.10 -16.90	106 SHORT
KQFM LIC NOTE:	HERMISTON OR	BLH-990520KB	263A 100.5	5.300 91.0	45-51-57 119-18-38	275.5	89.10 -16.90	106 SHORT
NEW-T APP	PULLMAN WA	BNPFT-030313BEJ	263D 100.5	0.013 162.0	46-43-36 117-12-24	35.2	127.39 0.00	0 TRANS
K264AW CP	GRANGEVILLE ID	BNPFT-030828AXY	264D 100.7	0.115 202.0	45-56-20 116-09-19	83.4	157.14 0.00	0 TRANS
NEW-T APP	CHENEY WA	BNPFT-030317EAY	264D 100.7	0.250 94.0	47-26-01 117-47-08	9.0	184.53 0.00	0 TRANS
ADD NOTE:	COLLEGE PLACE WA	RM-bg-19	264C2 100.7	0.000 0.0	45-59-04 118-10-08	359.9	21.09 -168.91	190 SHORT
NEW-T APP	PULLMAN WA	BNPFT-030317MRJ	264D 100.7	0.034 315.0	46-41-47 117-14-44	35.0	122.92 0.00	0 TRANS

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SEARCH PARAMETERS	FM Database Date: 050308
Channel: 264C2 100.7 MHz	Page 2
Latitude: 45 47 41	
Longitude: 118 10 6	
Safety Zone: 32 km	
Job Title: KHSS ATHENA 264C2	

=====

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
DEL	WALLA WALLA	264C3	0.000	45-59-04	359.9	21.09	177	
NOTE:	WA RM-bg-19	100.7	0.0	118-10-08		-155.91	SHORT	
=====								
KHSS	WALLA WALLA	264C3	1.300	45-59-04	359.9	21.09	177	
LIC	WA BLH-970827KD	100.7	419.0	118-10-08		-155.91	SHORT	
K265AP	LEWISTON	265D	0.108	46-27-42	49.7	115.87	0	
LIC	ID BLFT-811116IB	100.9	565.0	117-00-58		0.00	TRANS	
K265DX	ENTERPRISE	265D	0.010 DA	45-23-58	125.6	75.10	0	
LIC	OR BLFT-040601BNP	100.9	1073.0	117-23-16		0.00	TRANS	
KARY-FM	GRANDVIEW	265C2	6.900	46-29-12	299.2	161.31	130	
LIC	WA BLH-971010KH	100.9	387.0	120-00-12		31.31	CLEAR	
K266AJ	LA GRANDE	266D	0.250	45-19-48	173.5	51.98	0	
CP MOD	OR BMPFT-050103AAP	101.1	40.0	118-05-36		0.00	TRANS	
KCUW-LP	PENDLETON	266L1	0.100	45-39-36	244.4	34.51	0	
LIC	OR BLL-040205AFP	101.1	-64.6	118-34-04		0.00	LPFM	
K266AT	WALLA WALLA	266D	0.010 DA	45-59-18	358.7	21.52	0	
CP	WA BNPFT-030828AYF	101.1	824.0	118-10-28		0.00	TRANS	
KGDN	PASCO	267C3	2.750	46-05-47	293.3	86.26	56	
LIC	WA BLH-991018ABU	101.3	305.0	119-11-36		30.26	CLEAR	

===== BEGINNING SEARCH OF SECONDARY DATABASE =====

KHSS-H	ATHENA	264C2	0.000	45-47-41	0.0	0.00	190	
VACANT	OR -	100.7	0.0	118-10-06		-190.00	SHORT	

===== END OF FM SPACING STUDY FOR CHANNEL 264 =====

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SEARCH PARAMETERS FM Database Date: 050308
 Channel: 261A 100.1 MHz Page 1
 Latitude: 45 51 57
 Longitude: 119 18 38
 Safety Zone: 32 km
 Job Title: KQFM HERMISTON 261A

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T APP	RICHLAND WA	BNPFT-030317IHJ	258D 99.5	0.025 321.0	46-15-33 119-21-55	354.5	43.92 0.00	0 TRANS
NEW-T APP	HERMISTON OR	BNPFT-030317IJC	259D 99.7	0.170 129.0	45-45-46 119-10-57	139.1	15.17 0.00	0 TRANS
NEW-T APP	KENNEWICK WA	BNPFT-030317KMT	259D 99.7	0.015 396.0	46-14-04 119-19-13	359.0	40.98 0.00	0 TRANS
NEW-T APP	HERMISTON OR	BNPFT-030317IIV	260D 99.9	0.170 128.0	45-51-58 119-18-38	325.1	0.04 0.00	0 TRANS
KWRL LIC	LA GRANDE OR	BLH-970805KE	260C1 99.9	60.000 155.0	45-12-59 118-00-00	124.8	125.25 -7.75	133 SHORT
NOTE: TO 225C1 PER THIS PROPOSAL								
NEW-T APP	PENDLETON OR	BNPFT-030314BYY	260D 99.9	0.250 111.0	45-42-13 118-40-53	110.1	52.14 0.00	0 TRANS
NEW-T APP	PENDLETON OR	BNPFT-030317IUD	260D 99.9	0.250 112.0	45-41-42 118-50-24	117.3	41.23 0.00	0 TRANS
NEW-T APP	RICHLAND WA	BNPFT-030317KJO	260D 99.9	0.250 77.0	46-20-40 119-20-43	357.1	53.27 0.00	0 TRANS
ADD	ARLINGTON OR	RM-10458	261C2 100.1	0.000 0.0	45-43-14 120-11-59	257.1	71.00 -95.00	166 SHORT
NOTE: TO 295C2 PER THIS PROPOSAL								
ADD	ARLINGTON OR	RM-10667	261C2 100.1	0.000 0.0	45-43-04 120-11-53	256.9	70.94 -95.06	166 SHORT
NOTE: TO 295C2 PER THIS PROPOSAL								
ADD	ARLINGTON OR	RM-10663	261C2 100.1	0.000 0.0	45-43-01 120-11-59	256.8	71.09 -94.91	166 SHORT
NOTE: TO 295C2 PER THIS PROPOSAL								
K261BH LIC	HEPPNER OR	BLFT-850226TC	261D 100.1	0.048 345.0	45-23-28 119-30-15	196.0	54.88 0.00	0 TRANS
ADD	HERMISTON OR	RM-bg-19	261A 100.1	0.000 0.0	45-52-45 119-25-52	279.1	9.48 -105.52	115 SHORT
NOTE: DENIED PER R&O IN DOCKET 02-136								

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SEARCH PARAMETERS

FM Database Date: 050308

Channel: 261A 100.1 MHz

Page 2

Latitude: 45 51 57

Longitude: 119 18 38

Safety Zone: 32 km

Job Title: KQFM HERMISTON 261A

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K261BS LIC	MILTON-FREEWATER OR	BLFT-851224TC	261D 100.1	0.044 170.0	45-55-24 118-22-18	84.6	73.15 0.00	0 TRANS
K261CG LIC	PASCO WA	BLFT-930913TC	261D 100.1	0.011 518.0	46-06-23 119-07-50	27.4	30.16 0.00	0 TRANS
RSV	MOSES LAKE WA	RM-9269	262C 100.3	0.000 0.0	47-29-20 119-26-45	356.8	180.72 15.72	165 CLEAR
KWIK-FM APP	MOSES LAKE WA	BPH-050215ABU	262C1 100.3	100.000 51.0	47-06-09 119-14-26	2.2	137.57 4.57	133 CLOSE
KWIK-FM LIC	MOSES LAKE WA	BLH-830627AB	262C1 100.3	100.000 59.0	47-06-09 119-14-26	2.2	137.57 4.57	133 CLOSE
KWIK-FM RSV	MOSES LAKE WA	-	262C1 100.3	0.000 0.0	47-06-09 119-14-26	2.2	137.57 4.57	133 CLOSE
K262AV CP	WALLA WALLA WA	BNPFT-030826AGJ	262D 100.3	0.038 132.0	46-04-50 118-17-04	72.9	83.03 0.00	0 TRANS
ADD NOTE:	ARLINGTON OR	RM-bg-19	263C2 100.5	0.000 0.0	45-43-04 120-11-53	256.9	70.94 15.94	55 CLEAR
DEL NOTE:	HERMISTON OR	RM-bg-19	263A 100.5	0.000 0.0	45-51-57 119-18-38	0.0	0.00 -31.00	31 SHORT
KQFM LIC	HERMISTON OR	BLH-990520KB	263A 100.5	5.300 91.0	45-51-57 119-18-38	0.0	0.00 -31.00	31 SHORT
===== BEGINNING SEARCH OF SECONDARY DATABASE =====								
KQFM-H VACANT	HERMISTON OR	-	261A 100.1	0.000 0.0	45-51-57 119-18-38	0.0	0.00 -115.00	115 SHORT
===== END OF FM SPACING STUDY FOR CHANNEL 261 =====								

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SEARCH PARAMETERS FM Database Date: 050308
 Channel: 295C2 106.9 MHz Page 1
 Latitude: 45 33 52
 Longitude: 120 19 0
 Safety Zone: 32 km
 Job Title: ARLINGTON 295C2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T APP	CHENOWETH OR	BNPFT-030314ACX	292D 106.3	0.250 137.0	45-34-53 121-07-53	272.0	63.62 0.00	0 TRANS
NEW-T APP	CENTERVILLE WA	BNPFT-030312BCN	293D 106.5	0.010 803.0	45-40-53 120-54-30	286.0	47.94 0.00	0 TRANS
KEGX LIC	RICHLAND WA	BLH-930526KB	293C 106.5	100.000 320.0	46-05-51 119-11-30	55.4	105.60 0.60	105 CLOSE
KLTHaux LIC	LAKE OSWEGO OR	BXLH-001130AAG	294C 106.7	22.100 353.0	45-30-57 122-43-52	269.2	188.66 0.00	0 AUX
KLTH LIC	LAKE OSWEGO OR	BLH-970708KC	294C 106.7	100.000 440.0	45-30-58 122-43-59	269.2	188.81 0.81	188 CLOSE
NEW-T APP	FRUITVALE WA	BNPFT-030313BBJ	294D 106.7	0.250 53.0	46-35-12 120-33-26	350.8	115.14 0.00	0 TRANS
KMOK LIC	LEWISTON ID	BLH-830321AW	295C 106.9	99.000 375.0	46-27-33 117-02-18	67.4	272.69 23.69	249 CLEAR
ADD NOTE:	IONE OR	RM-11141	295A 106.9	0.000 0.0	45-24-46 119-55-21	118.6	35.12 -130.88	166 SHORT
LEAD PROPOSAL IN THIS PROCEEDING; 258A IS SUGGESTED AS ALTERNATE								
NEW-T APP	THE DALLES OR	BNPFT-030312BGT	295D 106.9	0.010 813.0	45-42-44 121-06-50	285.1	64.29 0.00	0 TRANS
K295AN CP	GRANDVIEW WA	BNPFT-030826AAC	295D 106.9	0.140 137.0	46-15-43 119-49-47	25.7	86.24 0.00	0 TRANS
K295AU CP	MOSES LAKE WA	BNPFT-030829BBY	295D 106.9	0.250 69.0	47-05-15 119-15-25	25.3	187.94 0.00	0 TRANS
NEW-T APP	SMITHVILLE WA	BNPFT-030317BVO	295D 106.9	0.250 109.0	45-39-05 121-08-30	278.9	65.08 0.00	0 TRANS
NEW-T APP	SMITHVILLE WA	BNPFT-030317JOJ	295D 106.9	0.250 109.0	45-39-05 121-08-30	278.9	65.08 0.00	0 TRANS
K295AV CP	WALLA WALLA WA	BNPFT-030829BEM	295D 106.9	0.010 735.0	45-59-38 118-10-47	73.2	172.92 0.00	0 TRANS

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SEARCH PARAMETERS

FM Database Date: 050308

Channel: 295C2 106.9 MHz

Page 2

Latitude: 45 33 52

Longitude: 120 19 0

Safety Zone: 32 km

Job Title: ARLINGTON 295C2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
NEW-T	DEE		296D	0.010	45-38-56	275.4	110.01	0
APP	OR	BNPFT-030317LXJ	107.1	1342.0	121-43-18		0.00	TRANS
NEW-T	SKAMANIA		296D	0.003	45-41-01	276.2	137.49	0
APP	WA	BNPFT-030313AAJ	107.1	798.0	122-04-17		0.00	TRANS
KFFMaux	YAKIMA		297C	0.300	46-38-26	357.1	119.77	0
LIC	WA	BXLH-991001ABU	107.3	419.0	120-23-45		0.00	AUX
KFFM	YAKIMA		297C	100.000	46-38-26	357.1	119.77	105
LIC	WA	BLH-990915AVQ	107.3	461.0	120-23-45		14.77	CLEAR
K298AN	WISHRAM		298D	0.010	45-40-53	286.0	47.94	0
CP	WA	BNPFT-030821ABW	107.5	803.0	120-54-30		0.00	TRANS
===== BEGINNING SEARCH OF SECONDARY DATABASE =====								
None-H	ARLINGTON		295C2	0.000	45-33-52	0.0	0.00	190
VACANT	OR	-	106.9	0.0	120-19-00		-190.00	SHORT
===== END OF FM SPACING STUDY FOR CHANNEL 295 =====								